

BALDWIN STOCKER, LLC

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Jonathan G. Spanier
President

August 6, 2014

BY EMAIL and USPS EXPRESS MAIL

Connie Chung, AICP, Supervising Regional Planner
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

**Re: Comments on the draft Environmental Impact Report (DEIR) for the
2014 Revised Draft General Plan 2035 (RDGP).**

Dear Ms. Chung:

**We are writing this letter in response to several provisions in the DEIR
issued on June 19, 2014 and in the interest of protecting our rights as a
private landowner in the areas affected by the DEIR and its related RDGP.**

**Baldwin Stocker, LLC (BSLLC) owns 120 acres of surface and mineral
rights in the Inglewood Oil Field (IOF) and has reserved those rights in
numerous documents dating back to the 19th century, most recently in
Document No. 20140380477.**

**First and foremost, the DEIR and RDGP policies should be consistent with
the Baldwin Hills Community Standards District (CSD) adopted by Los
Angeles County in 2008. The CSD imposed the strictest standards for any
urban oil field in the United States in order to protect the health and safety of
the adjacent residential communities.**

PUBLIC DESIGNATION ON THE INGLEWOOD OIL FIELD

**The DEIR and RDGP designate surface parcels within the IOF owned by the
City of Los Angeles Department of Water and Power (DWP) as Public and**

Semi Public (P). We understand that DWP has the right to use this surface property for operation and maintenance of high-voltage power lines as part of the electric system of the City of Los Angeles. However, those rights are subject to the terms of an underlying oil and gas lease executed in 1923 with Anita M. Baldwin, and further described in that Deed recorded on May 29, 1959 as Document No. 1503 and that Deed recorded November 7, 1946 as Document No. 2403 in the Official Records of Los Angeles County.

We are concerned that the proposed P land use designation does not acknowledge these private rights and accordingly could interfere with BSLLC's vested and mineral rights by disallowing any new, oilfield activities or uses within this surface area and allowing incompatible uses into this area – which in turn conflicts with other policies of the RDGP, DEIR and CSD and comprises the security and safety of the IOF. One solution to this issue that would provide consistency throughout RDGP, the DEIR, the CSD, and BSLLC's vested and mineral rights would be to include a statement within the purpose of the P land use designation disclosing “that uses compatible with the surrounding development (including but not limited to oil and gas production) are permitted”.

ZONING OF THE IOF

In the course of revising and amending the GP 2035 over the past several years, the IOF has been alternatively designated as Mineral Resources (MR) and Heavy Agriculture (A-2) For example, as MR in the DEIR; and as A-2 in map ZC16 updated May 15, 2014. Kindly clarify which classification is currently being proposed for adoption going forward and the differences between the two classifications.

Notwithstanding any of the above, the undersigned reserves all surface and subsurface rights owned in Los Angeles County.

Thank you in advance for your consideration of our comments and concerns. Please feel free to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Joneth A. Spanie". The signature is written in a cursive, flowing style.